

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALL RIGHT, TITLE, AND INTEREST IN:

ANY AND ALL SHARES OF STOCK AND  
ANY OTHER INTEREST IN BRYANSTON  
GROUP, INC. HELD IN THE NAME OR FOR  
THE BENEFIT OF BEATRICE N. TOLLMAN  
OR STANLEY S. TOLLMAN;

ANY AND ALL SHARES OF STOCK AND  
ANY OTHER INTEREST IN T.H. COURT  
CORP. HELD IN THE NAME OR FOR THE  
BENEFIT OF STANLEY S. TOLLMAN; and

ANY AND ALL PARTNERSHIP INTEREST  
AND ANY OTHER INTEREST IN T.H. COURT  
LIMITED LIABILITY PARTNERSHIP HELD  
IN THE NAME OR FOR THE BENEFIT OF  
STANLEY S. TOLLMAN OR BRETT G.  
TOLLMAN,

Defendants in rem.

Case No.: 08-CV-4806 (LAP/DCF)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for  
the Southern and Eastern Districts of New York, I, W. David Sarratt, a member in good standing  
of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: James M. Webster, III  
Firm Name: Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.  
Address: 1615 M ST NW, Suite 400  
City/State/Zip: Washington, DC 20036  
Phone Number: (202) 326-7900  
Fax Number: (202) 326-7999

James M. Webster, III is a member of good standing of the Bar of the States of Maryland and the District of Columbia. There are no pending disciplinary proceeding against James M. Webster, III in any State or Federal court.

Dated: July 8, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. David Sarratt', is written over a horizontal line.

W. David Sarratt

SDNY Bar Code: WS-1439

KELLOGG, HUBER, HANSEN, TODD,

EVANS & FIGEL, P.L.L.C.

1615 M ST NW, Suite 400

Washington, DC 20036

Tel.: (202) 326-7900

Fax: (202) 326-7999

*Counsel for Stanley Tollman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Case No.: 08-CV-4806 (LAP/DCF)

**Affidavit of W. David Sarratt  
In Support of Motion to Admit  
Counsel Pro Hac Vice**

I, W. DAVID SARRATT, being duly sworn, hereby deposes and says as follows:

1. I am an associate at the law firm of Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C, counsel for claimant Stanley S. Tollman in the above captioned action. The firm's address is 1615 M Street, N.W., Washington, D.C., 20036 and the firm's telephone number is (202) 326-7900.

2. I am a member in good standing of the bars of New York (2005), and the District of Columbia (2007). I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have never been disciplined, censured, suspended, or disbarred from the practice of law in any jurisdiction to which I have been admitted nor are there any disciplinary proceedings pending against me in any jurisdiction.

4. I am counsel for claimant Stanley S. Tollman in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of claimant's motion to admit James M. Webster, III as counsel pro hac vice to represent Mr. Tollman in this matter.

5. I have known Mr. Webster since 2006.

6. Mr. Webster is a partner in the firm of Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.

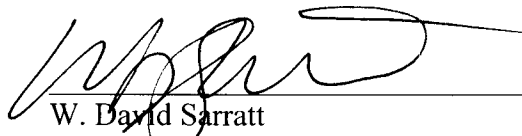
7. I have found Mr. Webster to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

8. Accordingly, I am pleased to move the admission of James M. Webster, III, pro hac vice.

9. I respectfully submit a proposed order granting the admission of James M. Webster, III, pro hac vice, which is attached hereto as Exhibit A.

10. WHEREFORE it is respectfully requested that the motion to admit James M. Webster, III, pro hac vice, to represent Claimant Stanley S. Tollman in the above captioned matter, be granted.

Dated: July 8, 2008  
Washington, DC

  
\_\_\_\_\_  
W. David Sarratt  
SDNY Bar Code: WS – 1439

Subscribed and Sworn to before me

this 8<sup>th</sup> day of July, 2008.

  
\_\_\_\_\_  
Notary Public, D.C.

My commission expires 10/31/2011

**Diane M. Cooke**  
**Notary Public, District of Columbia**  
**My Commission Expires 10/31/2011**



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JAMES M. WEBSTER, III

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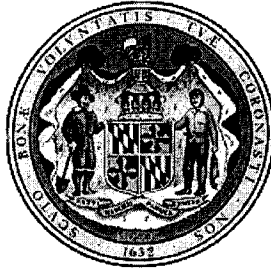
was on the 1<sup>ST</sup> day of APRIL, 1996  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on July 7,  
2008.

GARLAND PINKSTON, JR., CLERK

By: *N. Chabon*  
Deputy Clerk

**Court of Appeals  
of Maryland**  
Annapolis, MD



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the fifteenth day of December, 1994,*

**James McCormick Webster, III**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
seventh day of July, 2008.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*

UNITED STATES DISTRICT COURT  
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STANLEY S. TOLLMAN OR BRETT G.  
TOLLMAN,

Defendants in rem.

X

Case No.: 08-CV-4806 (LAP/DCF)

**ORDER FOR ADMISSION PRO  
HAC VICE ON WRITTEN  
MOTION**

X

Upon the motion of W. David Sarratt, attorney for Stanley S. Tollman, and said sponsor  
attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

James M. Webster, III  
Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.  
1615 M ST NW, Suite 400  
Washington, DC 200036  
Tel.: (202) 326-7900 / Fax: (202) 326-7999  
jwebster@khhte.com



is admitted to practice pro hac vice as counsel for Stanley S. Tollman in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

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United States District/Magistrate Judge

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing MOTION TO ADMIT COUNSEL *PRO HAC VICE* and AFFIDAVIT OF W. DAVID SARRATT IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE* was served via overnight mail on this 8th day of July, 2008, on:

Barbara Ann Ward  
U.S. Attorney's Office, SDNY (St. Andrew's)  
One St. Andrew's Plaza  
New York, NY 10007

Stanley John Okula, Jr.  
U.S. Attorney's Office, Sdny (White Plains)  
300 Quarropas Street, 3rd Floor  
White Plains, NY 10601

*Counsel for Plaintiff United States of America*

John Russell Wing  
Lankler Siffert & Wohl LLP  
500 Fifth Avenue  
33rd Floor  
New York, NY 10110

*Counsel for Claimant Brett Tollman*

Stuart Edward Abrams  
Frankel & Abrams  
230 Park Avenue - Suite 3330  
New York, NY 10169

*Counsel for Claimant Beatrice Tollman*



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Andrew M. Hetherington  
KELLOGG, HUBER, HANSEN, TODD,  
EVANS & FIGEL, P.L.L.C.  
1615 M ST NW, Suite 400  
Washington, DC 20036  
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